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ABSTRACT

The Immigration Reform and Control Act of 1986 (Simpson-Rodino Act) has many negative consequences for the city of New York (New York). Major provisions that will affect the city include the following: (1) sanctions on employers of illegal aliens; (2) an amnesty program for illegal aliens; (3) a 5-year limitation on newly amnestied aliens' eligibility for federal benefits; and (4) the Systematic Alien Verification for Entitlements (SAVE) program, which requires state and local benefit programs to verify applicants' immigration status. New York City lobbyists were instrumental in determining the amnesty date, reimbursement of state and local cost arising from the amnesty program, and the final version of the SAVE program. Undesirable effects will include the following: (1) the loss of substantial sums of money in unreimbursed services to newly legalized aliens; (2) cost of data collection and documenation by city service agencies to obtain reimbursement for educational and health services from block grants; (3) loss by present employers of illegal aliens, who compromise a significant part of their workforce; and (4) no means of support for illegal workers and their families in the city. Major recommendations include the support and expansion of the amnesty program and services, and simplification of the data collection process required for compliance and reimbursement. The appendices include a calendar of significant dates, and a description of the four methods of legalization in the Immigration Reform and Control Act. (FMW)

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TESTIMONY
BEFORE THE CITY COUNCIL COMMITTEE
ON INTERNATIONAL INTERGROUP RELATIONS AND SPECIAL EVENTS

THE IMMIGRATION REFORM AND CONTROL ACT OF 1986:

ITS EFFECTS ON NEW YORK CITY AND ON CITY GOVERNMENT

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November 18, 1986

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INTRODUCTION

The Immigration Reform and Control Act of 1986, signed into law on November 6, is the product of five years of Congressional debate, preceded by an additional eight or ten years of discussion and study. All along, the discussants addressed themselves to the increasingly heavy flow of undocumented aliens into the United States, and to the assumption--unproven but compelling--that these aliens' presence in the labor force hurt the job prospects and/or salary levels of authorized U.S. workers. That assumption was based on the idea that through their willingness to accept low wages and poor working conditions, undocumented aliens shouldered documented U.S. workers out of some jobs.

The primary provision of recent immigration proposals has been a system of civil and criminal sanctions against employers who knowingly hire unauthorized workers. Employer sanctions proponents believe that if the job market dries up, far fewer aliens will seek unauthorized entry, and many currently here will go home. The early framers of these employer sanctions provisions saw them as correcting an inequity that had made its way into the McCarran-Walter Immigration Act of 1952, in which it was made illegal for unauthorized aliens to work, but it was not made illegal for employers to hire them.

The major test of the new law will be whether it results in better and more numerous job opportunities for authorized U.S. workers.

SUMMARY OF NEW LAW'S PROVISIONS

1) Employer sanctions is the primary provision of the new law.

Other important provisions are:

2) an "amnesty" or legalization program which offers the prospect of achieving temporary legal immigration status (and later, permanent status) to aliens who arrived in the United States before January 1, 1982, and whose status has been unauthorized since that date. Before now, there was no "temporary legal resident" status in the immigration system. The amnesty program was intended to provide a humane counterbalance--one that would satisfy liberal legislators--to the employer sanctions provisions, and to acknowledge the fact that undocumented aliens who have been in the country for many years are an integral part of the social fabric.

3) limitations for five years on newly amnestied aliens' eligibility for some important federal benefits, coupled with a program to reimburse states and counties for service costs that will fall on them through the amnesty program. (Entitlements and reimbursements will be discussed later.)

4) civil penalities against employers who use the employer sanctions provisions as an excuse to discriminate against foreign-born or foreign-looking job applicants.

5) an agricultural worker legalization program which makes it particularly easy for agricultural workers to achieve legal status, first temporary and then permanent. This provision was included to defuse western growers' strong and influential opposition to employer sanctions; growers opposed the prohibition on hiring because of their reliance on undocumented labor. It was by a similar lobbying effort that southwestern interests kept employer sanctions out of the McCarran-Walter Act.

6) access to legal permanent residency for Cuban-Haitian

"entrants" and for some Cubans and Haitians living here illegally since before Jan. 1, 1982. Before now, Haitian entrants have not been eligible to apply for permanent resident status; Cuban entrants achieved the right to apply in 1985.

7) an update of what is known as the registry date. The update makes permanent legal residency available to aliens living here since before Jan. 1, 1972, rather than before June 30, 1948, the previous registry date. An alien may be documented or undocumented to qualify for permanent resident status under this program.

8) establishment of a system that requires all state and local benefit programs using federal money to verify benefit applicants' immigration status through the computer bank of the U.S. Immigration and Naturalization Service. The program is called SAVE, which stands for Systematic Alien Verification for Entitlements.

9) an increase from 600 to 5,000 in the number of visas available annually to colonial possessions, the most notable of which in this context is Hong Kong. Many Hong Kong residents want to emigrate now, as Hong Kong prepares to return to mainland Chinese rule.

It is important to note that the four legalization programs in the new law--i.e., the amnesty program for undocumented aliens living here since before 1982, the agricultural workers' legalization program, the Cuban-Haitian adjustment program, and the registry update--all have significantly different eligibility criteria and significantly different benefits in immigration status and public entitlements. For example, Cuban-Haitian entrants and aliens legalized under the registry update are eligible to become legal <u>permanent</u> residents with all the entitlements of permanent

residency, while aliens legalized under the amnesty and agricultural worker programs are eligible initially only for temporary legal residence and for very limited federal benefits during the first five years in legal status. Workers in a range of social programs will have to learn these differences in order to make correct entitlement eligibility determinations. All legal statuses, however, carry the right to work.

It is also important to note that no aliens are automatically eligible for legal status. They must meet the usual INS criteria, that is, they must show that they can support themselves, they must not have been convicted of serious crimes, and they must not be excludable for the host of other reasons specified under immigration law.* To become permanent residents, aliens in the amnesty program must be proficient in English and must demonstrate a knowledge of American civics, or be enrolled in a course of study to acquire these skills.

NEW YORK CITY LOBBYING EFFORTS

New York City's Washington office played an influential role in lobbying for a version of the law that would be fair to aliens and to local governments. City lobbyists sought and won a rational amnesty date, neither too generous nor too restrictive. They fought for full reimbursement of state and local costs arising from the amnesty program. They did not win 100 per cent reimbursement, but

*There are 33 grounds for exclusion including alcoholism, drug addiction, sexual deviation, prostitution, use of fraudulent immigration documents, mental retardation, past or present insanity, illiteracy, dangerous contagious disease, the practice or advocacy of polygamy, and a record of political subversion.

they are still pressing for a more favorable formula. As the law now stands, the federal government will make available $1 billion in each of four years; funds unexpended may be carried over from one year to the next. The federal government plans to take first cut of whatever is available each year, to cover its own costs. City lobbyists wish to see federal costs removed from under the billion dollar cap so the full amount is available to states and localities. They want to get the city reimbursed for its full actual costs, not for an estimate of its costs nor for a fraction of its costs. It is by no means clear that the present formula will cover the city fully.

Washington staff also lobbied for civil and criminal penalties against employers who use the law's provisions as an excuse to discriminate against foreign-born and foreign-looking job applicants. They were more than half successful in that civil penalties were added to the bill, along with a federal office that will judge cases of possible discrimination. Furthermore, the law provides that the employer sanctions program can be scrapped if it results in a widespread pattern of discrimination against citizens and other authorized workers.

Finally, New York City's lobbyists worked for the fairest possible version of the SAVE program, for 100 per cent reimbursement of local costs in administering it, and for the opportunity not to implement it if it appears that it will not be effective. The results of some recent pilot projects suggest that the program may cost more to operate than it saves in undeserved benefits. The city was successful in achieving 100 per cent reimbursement for materials and labor, and in guaranteeing an opportunity for federal

department Secretaries to decide against implementation if the prospects for cost-effectiveness appear poor. One determinant of cost-effectiveness will be the readiness of the INS computer system to provide accurate verifications. It is not clear that full and accurate data on immigrant status are or will be available in the INS computer banks. If the program does go into effect, it will do so in October 1988.

EFFECTS ON CITY GOVERNMENT: ENTITLEMENTS AND REIMBURSEMENT

The law will have many effects on New York City government, in addition to its effects on aliens, employers, business and industry, and immigrant service agencies.

The most obviously undesirable effect would be for the city to lose substantial sums of money in unreimbursed services to newly legalized aliens. As indicated earlier, the city is pressing for an equitable reimbursement formula. In addition, city analysts must come to a perfect understanding of the federal benefits that will be available to newly legalized aliens, and the state and local benefits for which the city can receive reimbursement.

At present, it seems that amnestied aliens will be eligible for the following federal benefits: Job Training Partnership Act, public health programs, college grants and loans, Head Start, child welfare and daycare services, and primary and secondary school programs such as school breakfasts and lunches. The elderly, blind and disabled are eligible for Supplemental Security Income (SSI), Food Stamps, and Medicaid. All other amnestied aliens are specifically disqualified from Aid to Families with Dependent Children (AFDC) and Food Stamps for five years after achieving temporary legal residency.

They are also ineligible for Medicaid until they achieve permanent resident status, with the exception of emergency cases, children, and pregnant women, who are eligible as soon as they become temporary residents. Their eligibility for various other federal programs, such as federally-subsidized housing, is not specified in the law.

The law requires that regulations, whether interim or final, be promulgated by May 6, 1987. The period from now until then is viewed as an "education" period during which few provisions of the law take effect. It is unlikely that there will be enough time between promulgation of the regulations and the beginning of the implementation period for government and non-government agencies to develop and enact their own implementation plans.

The federal law leaves it to the discretion of the states whether they wish to provide state and local benefits to amnestied aliens. The city is now analyzing state law and regulations to determine whether amnestied aliens would be eligible as the laws and regulations now stand. Policy decisions must then be made on whether existing arrangements are desirable. If not, amendments to state laws and/or regulations may have to be made. The benefits in question are primarily state Medicaid and Home Relief. Regardless of the decision on these two programs, amnestied aliens will be eligible for public schooling and municipal health services, to which they were already entitled while in undocumented status.

The reimbursement provisions call for block grants to states based on the numbers of aliens in the amnesty program and the actual costs of service (estimates in the first year). To obtain maximal reimbursement for the city, service agencies will have to identify the immigration status of their clients, and record the

number of amnestied aliens served, the type of service, and the cost of service. Agencies of which this data collection effort may be required include the Human Resources Administration, the Board of Education, the Health and Hospitals Corporation and/or the Department of Health.

The Board of Education will have to keep records because the block grant rules require that at least 10 per cent be spent on educational services to amnestied aliens, the most important of which services are probably English as a Second Language (ESL) and citizenship classes that can help aliens qualify for permanent residency. For all other aliens, these skills are required only when application is being made for citizenship. Regardless of the block grant rules, the city may wish, and be called upon, to increase its ESL and citizenship classes in order to assist amnestied aliens in their permanent residency applications.

The block grant rules also require a 10 per cent expenditure on public health programs such as immunization, tuberculosis and venereal disease treatment, and family planning services. The Department of Health is generally viewed as the main source of these services, but it will mean a radical revision in DOH intake procedures if DOH must collect such data as its clients' immigration status. As a matter of policy and practice, DOH provides free service to all comers, with very few questions asked. It may be possible for HHC to qualify as a provider of these health services, and it would be much easier for HHC to meet the data requirements since HHC collects more data at intake.

Under the provisions of the SAVE program, agencies like HRA that administer federally subsidized benefits in cash or service

will be required to install computers with hookups to the INS, and to assign staff to work them. To get reimbursed for labor and OTPS costs, agencies will have to record those costs.

These new rules place an enormous task of education and planning on the city and its agencies. Line workers cannot make proper eligibility determinations without understanding the benefits criteria, nor can they collect the data required for reimbursement unless there is a data collection system within the agency and they have learned to follow it. These systems must be designed, put in place, coordinated and monitored.

CITY GOVERNMENT AS EMPLOYER

New York City government is an employer of nearly 300,000 people. The city will be required to follow the same rules as other employers, and will be subject to the same penalties for violations. Ironically, since the city strongly supported the anti-discrimination provisions, it will also be potentially liable to charges of discrimination in hiring if applicants feel thay have been rejected on the basis of foreign birth or foreign appearance.

It became illegal for an employer to hire an unauthorized alien on the day the President signed the bill, November 6. It also became illegal to continue to employ aliens hired after that date who are later found to be undocumented or to have lost their work authorization. It is extremely important to note that <u>aliens who were hired before November 6 are exempt from the new rules and may continue to be employed, whatever their status, without penalty to their employers</u>.

The federal government will take no action to enforce the law

until May 6, 1987. Then for one year, from May 6, 1987, to May 6, 1988, it will "cite" employers who violate the rules. Civil and criminal penalties will not be applied. It is possible, however, that employers who incur citations will later be liable for stricter penalties, should more violations occur, than they would have been had their earlier records been clear. It should be noted that hiring unauthorized aliens is already against city policy, but it is not clear how strong an effort is currently made to document work authorization.

After May 6, 1987, the city, like all employers, will have to ask documentation from all applicants to show their identity and their right to work in the United States. The law states which documents may be used for these purposes. Employers will be required to peruse these documents for their probable authenticity, but they will not be held liable later if the documents are revealed as convincing fakes. For each new employee, the employer must sign a statement that he or she reviewed the documentation, and the employee must sign a statement that he or she is authorized to work. The employer must keep these signed statements on file for three years after hiring or for one year after the employer's termination, whichever is later.

Penalties for unlawful hiring or employment of aliens range from fines of $250 to $10,000 per hire and six months in jail depending upon the number of times that such violations have occurred. Penalties ranging from $100 to $1,000 per employee may be leveled for paperwork violations.

It is also illegal for an employer to contract or subcontract for labor, knowing that the worker is an unauthorized alien. This

provision may be of particular significance to the city since some city contractors are believed to be large-scale employers of undocumented aliens, for example, the vendor agencies that provide home care workers to HRA.

These hiring, contracting and documentation provisions will affect the city's Department of Personnel and all agencies that do their own hiring and/or contracting. The Mayor's Office of Operations is about to call a meeting for Personnel staff to clarify the new requirements and their implementation schedule.

EFFECTS ON THE CITY AS A WHOLE

One of the many important and currently unanswerable questions arising in the context of the new law is the number of aliens who will regularize their status through the amnesty program, and the number who won't.

City Planning has estimated that there may be somewhere between 400,000 and 750,000 undocumented aliens in the city of New York. Some experts believe that no more than 25 per cent of them will be eligible for, and will take the risk of applying for, the amnesty program. Other analysts believe the figure may be closer to 50 per cent. These estimates cannot be considered more than educated guessing, but it does seem possible that even after the amnesty program, there may still be somewhere between 300,000 and 600,000 undocumented aliens in the city.

It will be a risk for aliens to come forward. Almost no alien applying for a change of immigration status can ever be sure that he or she will be found qualified for the status change; the rules are not that clear-cut. If an undocumented alien applies, he or

she invites the possibility of deportation. There is wording in the new law to suggest that rejected amnesty applications will not lead to deportation actions, but the language is too vague to be reassuring.

Aware that the perceived risk may discourage prospective applicants, the federal government plans to authorize a number of immigrant service agencies and other community agencies to provide immigration counseling and to screen applicants for probable eligibility. The risk can be minimized further if the regulations provide clear, specific criteria for eligibility--clearer and more specific than aliens currently find. Aliens will have only one shot at applying; a rejected applicant cannot come back later having learned how to make a better case. The applicant must understand the criteria the first time around.

Despite the limitations of the screening system, it is in the alien's best interest to consult with a non-federal agency, or with an immigration lawyer, before making application to the INS. City workers can provide a valuable service to their alien clients by advising that they consult with immigration specialists before making contact with the INS. The names of the agencies that will be deputized to provide counseling and screening will be available no later than May 6, 1987, when the amnesty application period begins. Applications may be made during the one-year period ending May 6, 1988.

The amnesty program presents a unique opportunity for the city, and the entire country, to learn about undocumented aliens. Over the past three years, the Department of City Planning has made recommendations to the INS on the data that should be gathered from

applicants at intake. City Planning has also recommended that the INS develop a computerized data base that is made available to localities.

The city may need and want more information than the INS application form provides. City agencies should be prepared to make the best possible use of their own opportunities for data collection and analysis. Individuals' names need not be recorded; it is the demographic, socioeconomic and service use data that are important.

These data questions are important to government; what concerns prospective applicants (other than their risk) is the difficulty they may have in amassing the documents that will demonstrate their eligibility for legalization. They have generally taken great pains to avoid documentary evidence of their existence, but now that evidence will be needed. The most difficult demand for them to satisfy may be proof of their ability to support themselves. The best proof is evidence of having worked, i.e., employment records. Employers who were paying withholding taxes and Social Security for their undocumented workers may be happy to provide documentation of employment, but those who were evading the tax system may not be willing to expose themselves to liability for back taxes, and they may refuse to supply proof of past employment. The federal government has said that there will be no amnesty from tax liability for employers or workers.

Perhaps the greatest unknown of all is whether employer sanctions can and will be enforced. If they are enforced, that may leave a large pool of unemployed alien workers and their families living in the city without visible means of support. What will

become of them? Will they return to their home countries, as legislators hope? Will they find new ways to make money off the books, in the underground economy, or in a new growth of home industry? Will they stay here but fail to support themselves, thereby adding to the city's homeless and helpless population? Or will convincing bogus documents be so readily available that undocumented aliens can continue to obtain jobs?

If employers do cease to hire unauthorized workers, some businesses and industries may lose significant portions of their workforce; for example, the small manufacturing, restaurant and hotel industries. It is not clear whether New York's apparel manufacturing industry will survive if it loses the undocumented, low-wage portion of its workforce. Loss of the industry would leave both authorized and unauthorized workers unemployed and would further erode the city's dwindling industrial base. The new law is intended to increase employment opportunities for authorized workers, but in some instances it may decrease them.

Leaving aside the economic and social impacts of the employer sanctions and legalization programs, there is a fairness issue as well. Amnesty will be available only to those aliens who have remained in undocumented status continuously since the beginning of 1982. There are many aliens who have been living here since then in legal but non-permanent statuses, such as students and temporary workers. If an alien occupied a legal status for any length of time since Jan. 1, 1982, he or she is not eligible for amnesty. To some persons, it appears that law-breakers are being rewarded while law-keepers are penalized. Legislators considered an amnesty for <u>all</u> aliens living here continuously since

Jan. 1, 1982, but they rejected it fearing that the numbers of amnestied aliens would be too high. Now aliens and alien advocates are making greater protest about the exclusion of the sometime-legal. It is possible that efforts will be made in Washington to amend the law to include these aliens under the amnesty program. The city may wish to support such efforts.

SUMMARY OF RECOMMENDATIONS

1) The city must insist that the INS consider New York's interests and concerns before promulgating the final regulations that will implement the new immigration law. It must also insist that the federal government postpone enforcement until employers, agencies and aliens have been given a reasonable period of time in which to study the new rules and bring themselves into conformity with them.

2) The city should insist that the regulations be as clear and specific as possible so that the city can meet its obligations under the law, and incur its benefits. Perhaps an even more important reason for clarity is to encourage prospectively eligible applicants for amnesty to come forward. The more aliens achieve legal status, the healthier a city New York City will be for it, socially as well as economically. A large "underground" population is a misfortune.

3) The city should consider supporting an adjustment program for aliens living here since before Jan. 1, 1982, who may have occupied a legal status for some or all of that time.

4) The city should continue to fight for a favorable formula for reimbursement of costs incurred as a result of the amnesty program.

5) The city must design data collection programs that will make reimbursement possible, and implement, coordinate and monitor them.

6) City workers must be educated in the technicalities of the new law so that benefits may be distributed equitably and correctly.

7) City workers can assist aliens seeking amnesty by advising them to confer with lawyers or staff members of non-federal agencies deputized to provide immigration counseling.

8) The city should provide more adult ESL and citizenship classes to meet the needs of amnestied applicants for permanent resident status.

9) City personnel offices must prepare themselves to request and review the employment documentation required of all applicants under the new law, and to keep records of having done so. They must be sure that undocumented aliens are not being hired now.

10) The city's use of undocumented contract labor, and its obligations to ascertain contract workers' status, must be evaluated. If necessary, authorized replacements must be found.

11) The unique opportunity for the city and country to learn about undocumented aliens must not be lost. The city should continue to support federal data collection efforts, and should undertake its own. Both the newly amnestied and the still-undocumented should be studied, where possible. In particular, the fates of those undocumented aliens who cannot find work should be followed. So should the fate of industries that lose large portions of their workforce.

12) Finally, the federal government must track unemployment rates among authorized U.S. workers to determine whether the employer sanctions program is succeeding in improving their job

prospects. If employer sanctions are not achieving their end, and if they are posing an excessive hardship to employers and/or workers, the need for their continuance must be evaluated.

APPENDIX

SOME SIGNIFICANT DATES UNDER THE NEW LAW

November 6, 1986: The President signs the Immigration Reform and Control Act of 1986.

a) It is no longer legal for an employer to hire an alien who lacks work authorization, but aliens hired before this date may continue to work regardless of their status.

b) The federal government has six months--i.e., until May 6, 1987--to promulgate interim or permanent regulations.

c) Aliens who have lived continuously in the United States since before Jan. 1, 1972, may apply at any point for legal permanent residency--or they may when the application forms become available.

d) Cubans and Haitians who qualify have two years from this date to apply for legal permanent residency under the Cuban-Haitian adjustment program. Again, in practice, they must wait until application forms are available.

May 6, 1987: The employer sanctions and amnesty programs go into effect.

a) Implementing regulations are due from the federal government.

b) Employers are required to check every job applicant for authorization to work, and they are required to keep records of having done so.

c) The federal government will issue "citations" against employers who violate these provisions during the one-year period through May 6, 1988.

d) Aliens have one year from this date to make application for temporary legal residency under the amnesty program.

e) The new benefit rules for amnestied aliens go into effect.

f) Localities' eligibility for reimbursement of the cost of services to amnestied aliens begins.

May 6, 1988: Civil and criminal sanctions against employers who knowingly hire unauthorized workers, or who fail to keep the required records, will be leveled from this date.

October 1, 1988: The SAVE program (Systematic Alien Verification for Entitlements) goes into effect.

FOUR METHODS OF LEGALIZATION IN THE IMMIGRATION REFORM AND CONTROL ACT OF 1986 (SIMPSON-RODINO ACT)

1. "Amnesty" Program. Aliens must prove they have been in illegal status in the U.S. since prior to January 1, 1982. They must apply for temporary legal resident status in the one-year period beginning May 6, 1987. After 18 months as temporary legal residents, they have one year in which to apply for legal permanent resident status. If they do not apply for legal permanent resident status, or if they do not qualify for it, they lose their legal status.

   Before temporary legal residents in this program can become legal permanent residents, they must pass tests in English and civics or be enrolled in English and civics courses. The "amnesty" program is the only legalization method that has English and civics requirements for applicants for legal permanent resident status.

   From the date that they become temporary legal residents, people in this program are ineligible for five years for AFDC, Food Stamps, and other unidentified federal assistance programs. They are ineligible for Medicaid until they become legal permanent residents, except for children, pregnant women, and emergency cases, who are eligible from the time they become temporary legal residents. The blind, elderly, and disabled are eligible for SSI, Food Stamps, and Medicaid from the time they become temporary legal residents.

2. Schumer Farmworkers Program. Aliens must prove they have worked 90 days in U.S. agriculture in the period May, 1985 to May, 1986. They must apply for temporary legal resident status during the 18-month period starting June 6, 1987. They automatically become legal permanent residents after two years as temporary legal residents. People who can prove they worked 90 days in U.S. agriculture in each of the last three years can automatically go from temporary legal resident status to legal permanent resident status after a year instead of two years.

   People in this program are ineligible for AFDC for five years from the date on which they become temporary legal residents. They are ineligible for Medicaid until they become legal permanent residents, except for children, pregnant women, and emergency cases, who are eligible from the time they become temporary

legal residents. The blind, elderly and disabled are eligible for Medicaid and SSI from the time they become temporary legal residents.

3. Cuban-Haitian Adjustment Program. Applicants must be 1) Cuban-Haitian "entrants" who have been in the U.S. since prior to January 1, 1982, or 2) Cubans and Haitians who have been in the U.S. since prior to January 1, 1982, who established a record with the Immigration and Naturalization Service prior to January 1, 1982, and who were (except for those who applied for asylum prior to January 1, 1982) not admitted as non-immigrants. They must apply for legal permanent resident status within the two-year period starting November 6, 1986.

   There are no restrictions on federal benefits for Cuban-Haitian "entrants" who become legal permanent residents under this program. For the other Cubans and Haitians, the situation is unclear.

4. Registry Update. Aliens must prove they have resided in the U.S. since prior to January 1, 1972. They can apply for legal permanent resident status any time from November 6, 1986. Eligibility is not limited to undocumented aliens.

   There are no restrictions on federal benefits for people who become legal permanent residents through the registry update.

New York City
Department of City Planning
Office of Immigrant Affairs
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